



December 15, 2025

Mr. Matthew Soldner  
Acting Commissioner, National Center for Education Statistics  
Acting Director, Institute of Education Sciences  
United States Department of Education  
400 Maryland Ave, SW  
Washington, DC 20202

Dear Mr. Soldner:

I write on behalf of the American Association of Community Colleges (AACC) concerning the U.S. Department of Education's (ED) November 13, 2025 Notice in the Federal Register submitting the Integrated Postsecondary Education Data System (IPEDS) 2025-26 through 2026-27. These comments focus on the new proposed IPEDS survey called "Admissions and Consumer Transparency Supplement" (ACTS). AACC represents the nation's 1,024 community colleges and their students. The association appreciates the opportunity to submit these comments.

On behalf of AACC, I want to thank the Department for your thoughtful consideration of our previous comments on the ACTS IPEDS survey, and for excluding the bulk of our institutions from the reporting requirements. As our public comments stated, community colleges present minimal risk for noncompliance with relevant provisions. Much of the data required for reporting is not relevant to community colleges and is not collected by them. Excluding community colleges from the new reporting requirements ensures that limited campus resources remain focused on student success.

However, we are extremely concerned that the definitions used in the 2025-26 IPEDS glossary will inaccurately categorize many community colleges as four-year colleges, inadvertently including these institutions in the ACTS survey. This would undermine the Department's intent to focus the survey on institutions that have dramatically different admissions and financial aid policies than community colleges.

The proposed 2025-26 IPEDS Glossary defines a two-year institution – exempted from the ACTS requirements – as a "postsecondary institution that offers programs of at least 2 but less than 4 years duration" and a four-year institution – subjected to the ACTS requirements – as a "postsecondary institution that offers programs of at least 4 years duration or one that offers programs at or above the baccalaureate level."

As the Department is aware, approximately 190 community colleges across the United States offer a small number of bachelor's degree programs in in-demand fields. These fields include allied health, specialized agriculture, and advanced manufacturing. A community college's open-enrollment status, aid awarding practices, and risk for noncompliance with relevant requirements does not change if they offer a limited set of bachelor's degree programs to meet local industry or community needs.

As stated in our earlier comments, community colleges do not collect high school grades and college standardized test scores, do not use early decision for admissions, and do not collect financial information on the bulk of our students or their parents for our certificate, associate, or baccalaureate programs. Community colleges are aware of the specific legal requirements that apply to the awarding of scholarships and financial aid at all degree levels. Including these colleges in the ACTS survey because they offer a limited number of bachelor's degree programs would drain substantial amounts of fixed institutional resources to no meaningful end. The rationale used by the Department to exempt those community colleges who provide no programs beyond the associate degree, still apply to community colleges that award a small number of bachelor's degrees.

To this end, we ask the Department to use an alternative method for classifying community colleges for the purpose of ACTS eligibility. Moving from a "highest degree offered" measure to a "predominant degree awarded" measure would be appropriate and would more accurately refine the universe of inquiry for the ACTS survey. If it is not possible to wholly exempt what is commonly accepted as a community college, we ask the Department to limit ACTS reporting to only bachelor's degree-seeking students. That said, even this limited application would contain the same flaws that the ACTS survey generally does for community colleges.

We thank the Department for their recognition that the ACTS survey is not applicable to community colleges. We ask you to ensure that community colleges offering bachelor's degree programs are not subjected to these costly and burdensome reporting requirements on a technicality.

Thank you for your consideration of these views. Please do not hesitate to contact me or any members of my staff if you have any questions concerning them.

Sincerely,

A handwritten signature in black ink, reading "DeRionne P. Pollard". The signature is fluid and cursive, with the first name "DeRionne" being more prominent.

DeRionne P. Pollard, Ph.D.

President and CEO